

THIRD SEMI-ANNUAL PROGRESS REPORT

**FORMER CHLORATE PLANT SITE
1400 WEST NINTH STREET
BRUNSWICK, GLYNN COUNTY, GEORGIA
HSI SITE NUMBER 10619**

PREPARED FOR:

**BRUNSWICK CELLULOSE, INC.
1400 WEST NINTH STREET
BRUNSWICK, GEORGIA, 31520**

and

**GEORGIA-PACIFIC LLC
133 PEACHTREE STREET
ATLANTA, GEORGIA, 30303**

PREPARED BY:

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EarthCon Project No. 02.20060163

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PG CERTIFICATION

"I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, et seq.). I am a professional engineer/professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances.

Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division.

The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Carol Northern

Carol D. Northern, P.G.
Principal Geologist

Registration No. 793
State of Georgia

Date: 8/27/13



1.0 INTRODUCTION

The Voluntary Investigation and Remediation Plan Application (VIRP) for the Brunswick Cellulose, Inc. (BCI) Pulp Mill, located at 1400 West Ninth Street in Brunswick, Glynn County, Georgia (HSI Site #10619) was submitted to the Georgia EPD on October 4, 2011. BCI is a wholly owned subsidiary of Georgia-Pacific LLC (GP). The VIRP was approved in a letter dated March 26, 2012. This Third Semi-Annual Progress Report provides a summary of activities conducted at the site from March 2013 through July 2013.

2.0 SUMMARY OF SITE ACTIVITIES

As described in the Voluntary Remediation Plan, corrective action for soils will be limited to recording of property notices and an annual site reconnaissance. Corrective action for groundwater will consist of institutional controls, groundwater monitoring and groundwater modeling. Activities conducted from March through July 2013 are described in the following sections.

2.1 Environmental Covenant

Institutional controls will be used to eliminate possible groundwater exposure pathways. To accomplish this, BCI/GP submitted an Environmental Covenant in conformance with the Georgia Environmental Covenants Act to the Georgia EPD on June 8, 2012. On August 31, 2012, Georgia EPD provided BCI/GP with comments to the Environmental Covenant. BCI/GP provided a response to comments on September 6, 2012. On June 26, 2013, Georgia EPD provided BCI/GP with additional comments. BCI/GP provided a response to comments on August 27, 2013.

2.2 Groundwater Modeling

As required by the approved Voluntary Remediation Plan, dated October 2011, the Second Semi-Annual Progress Report, which included the result of the groundwater modeling, was submitted to Georgia EPD on March 22, 2013. On April 24, 2013, Georgia EPD provided informal comments to the groundwater model. In response to these comments, the groundwater model was revised. The revised model is presented in the Addendum #1 to the Second Semi-Annual Progress Report which is was submitted to Georgia EPD concurrent with this document.

2.3 Groundwater Sampling

Per the approved Voluntary Remediation Plan, dated October 2011, a semi-annual groundwater sampling event would have been required in August 2013. However, based on the results of the groundwater model, the Georgia EPD agreed that additional groundwater monitoring is not required at the Site. Georgia EPD's approval to cease groundwater monitoring was provided in an email dated August 12, 2013.

3.0 SUMMARY

Based on Georgia EPD's approval to cease groundwater monitoring at the Site, the additional groundwater monitoring and reporting activities proposed in the approved Voluntary Remediation Plan are no longer required. The next required submittal will be the Compliance Status Report Update. A revised Schedule is provided in Table 1.

4.0 MONTHLY INVOICE SUMMARY

Georgia EPD requires that the professional engineer/geologist specified in the VIRP oversee the implementation of the VIRP in accordance with the provisions, purposes, standards and policies of the Georgia Voluntary Remediation Program Act. During the period from March 1, 2013 to July 31, 2013, Ms. Carol Northern, P.G. invoiced 64 hours on this project. A monthly summary of hours invoiced and a description of services provided is shown in Table 2.

Table 1: Revised Milestone Schedule

Date	Activity
<i>March 26, 2012</i>	<i>VRP Application Approved</i>
<i>April 24, 2012</i>	<i>Cost Estimate and Financial Instrument Submitted</i>
<i>May 7, 2012</i>	<i>Filing of Affidavit with clerk of Superior Court of Glynn County pursuant to O.C.G.A. §44-2-20</i>
<i>May 16, 2012</i>	<i>Submittal of copy of receipt of recorded Affidavit to EPD</i>
<i>May 7-10 and June 18-19, 2012</i>	<i>First Quarterly Sampling Event and Well Repair Activities</i>
<i>August 6-9, 2012</i>	<i>Second Quarterly Sampling Event</i>
<i>September 18, 2012</i>	<i>Submittal of First Semi-Annual Progress Report</i>
<i>November 5-8 and 28, 2012</i>	<i>Third Quarterly Sampling Event</i>
<i>January 30, 2013</i>	<i>Submittal of Annual Site Inspection Form</i>
<i>February 4-6, 2013</i>	<i>Fourth Quarterly Sampling Event</i>
<i>March 22, 2013</i>	<i>Second Semi-Annual Progress Report</i>
<i>August 2013</i>	<i>Addendum #1, Second Semi-Annual Progress Report</i>
<i>August 2013</i>	<i>Third Semi-Annual Progress Report</i>
<i>December 2013</i>	<i>Compliance Status Report Update</i>

Note: Annual Site Inspection Forms will be submitted by January 30th of each year

Table 2: Summary of Monthly Invoices

Month	Hours Billed by Carol Northern, P.G.	Description of Activities
March 2013	37.5	<ul style="list-style-type: none"> – Data analysis for groundwater model – Review groundwater model results – Preparation and submittal of the Second Semi-Annual Progress Report
April 2013	3	<ul style="list-style-type: none"> – Review preliminary EPD comments on the groundwater model
May 2013	12	<ul style="list-style-type: none"> – Review planned revisions to the groundwater model with project team – Revise groundwater model
June 2013	7.5	<ul style="list-style-type: none"> – Preparation and submittal of draft Addendum #1 to the Second Semi-Annual Progress Report which includes revised groundwater model
July 2013	4	<ul style="list-style-type: none"> – Telephone calls/emails with Georgia EPD regarding draft Addendum #1 and cessation of groundwater monitoring – Review comments/responses to the proposed Uniform Environmental Covenant